



NATIONAL CONSUMERS LEAGUE

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Via Electronic Filing

November 18, 2016

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street SW

Washington DC 20554

**Re: Support for Petitions for Waiver in WC Docket Nos. 11-42, 09-197, 10-90**

Dear Secretary Dortch:

The National Consumers League<sup>1</sup> ("NCL") believes that the Lifeline low-income subsidy support program benefits millions of low-income American households, and can help even more of our citizens with the enactment of the recent reforms which will expand the program to support broadband.<sup>2</sup> It is with that belief in mind that NCL submits this letter to support the efforts of the diverse coalition of low-income, civil rights, labor advocacy voices who have called on the Commission to stay its 30-day non-usage rule, conditioned on leaving the current 60-day non-usage rule in place. Specifically, NCL supports the Petition for Reconsideration<sup>3</sup> and Motion to

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<sup>1</sup> The National Consumers League, founded in 1899, is America's pioneer consumer organization. Its mission is to protect and promote social and economic justice for consumers and workers in the United States and abroad. For more information, visit [www.nclnet.org](http://www.nclnet.org).

<sup>2</sup> Federal Communications Commission. "FCC MODERNIZES LIFELINE PROGRAM FOR THE DIGITAL AGE," Press Release. March 31, 2016. Online: [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-338676A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-338676A1.pdf)

<sup>3</sup> TracFone Petition for Reconsideration, Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 09-197, 10-90 (filed June 23, 2016).

Stay<sup>4</sup> filed by TracFone and the similar Petition for Waiver filed by the Lifeline Connects Coalition.<sup>5</sup>

In its motion, TracFone noted that “approximately twenty-five percent of persons de-enrolled following 60 days” re-enroll the following month. Furthermore, 70 percent of those who were de-enrolled seek to re-enroll during the first 15 days of the following month. TracFone estimates that under the a 30-day non-usage rule, the number of Lifeline consumers who are de-enrolled for non-usage, who then re-enroll back into Lifeline will triple.<sup>6</sup> Sprint’s filing comments corroborate the magnitude of this situations these statistics, saying that in a “30 day period, 38 percent resume their usage within the next 15 days, while 66 percent resume usage within the next 60 days.” <sup>7</sup>

Given the re-enrollment statistics cited by TracFone and Sprint, we are convinced that the 30-day non-usage rule will disproportionately and negatively affect large numbers of low-income Lifeline users without achieving significant and countervailing reductions in administrative costs.

The Lifeline program provides a critical connection for millions of low-income consumers to family support systems, employers, government and educational resources and health care providers. The transition of Lifeline to supporting broadband service promises to make this program even more useful to the millions of consumers who depend on it. We therefore join our colleagues in the public interest, civil rights and labor communities in supporting the petitions requesting

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<sup>4</sup> TracFone Motion for Stay or, in the Alternative, Deferral of the Effective Date, Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 09-197, 10-90 (filed September 8, 2016).

<sup>5</sup> Lifeline Connects Coalition, Petition for Waiver, Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 09-197, 10-90 (filed October 25, 2016).

<sup>6</sup> TracFone Petition for Reconsideration, Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 09-197, 10-90 (filed June 23, 2016) at 24.

<sup>7</sup> See, Sprint Comments, Lifeline and Link Up Reform and Modernization, WC Docket Nos. 11-42, 09-197, 10-90 (filed July 29, 2016) at 6-7.

that the 30-day non-usage rule be waived, conditioned on leaving the current 60-day non-usage rule in place.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "John D. Breyault". The signature is written in dark ink on a white background.

John D. Breyault

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National Consumers League

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